

Final

Amended Parcel B Record of Decision

Hunters Point Shipyard San Francisco, California

January 14, 2009

Prepared for:

Base Realignment and Closure Program Management Office West San Diego, California

Prepared by:

ChaduxTt, A Joint Venture of St. George Chadux Corp. and Tetra Tech EM Inc.
1230 Columbia Street, Suite 1000
San Diego, California 92101

Prepared under:

Naval Facilities Engineering Command Contract Number N62473-07-D-3213 Delivery Order 0019

CHAD.3213.0019.0014

TABLE A.4-1

REMEDIATION GOALS

Radionuclide	Surfaces (dpm/1	00 cm ²)	Soil ^c (pCi/g)		
Radionucinde	Equipment, Waste ^a	Structuresb	Outdoor Worker ^d	Residential ^d	
cesium-137	5,000	5,000	0.113	0.113	
cobalt-60	5,000	5,000	0.0602	0.0361	
plutonium-239	100	24.7	14.0	2.59	
radium-226	100	100	1.0°	1.0°	
strontium-90	1,000	1,000	10.8	0.331	
thorium-232	1,000	36.5	2.7	1.69	
hydrogen-3	5,000	5,000	4.23	2.28	
uranium-235	5,000	488	0.398	0.195	

Notes:

- ^a These limits are based on AEC *Regulatory Guide 1.86* (1974). Limits for removable surface activity are 20 percent of these values.
- These limits are based on 25 mrem/y, using Decontamination and Decommissioning Version 2 or *Regulatory Guide 1.86*, whichever is lower.
- ^c EPA PRGs for two future-use scenarios.
- The on-site and off-site laboratory will ensure that the MDA meets the listed release criteria by increasing sample size or counting time as necessary. The MDA is defined as the lowest net response level, in counts, that can be seen with a fixed level of certainty, customarily 95 percent. The MDA is calculated per sample by considering background counts, amount of sample used, and counting time.
- ^e Limit is 1 pCi/g above background; not to exceed 2 pCi/g total, per agreement with EPA.

Abbreviations and Acronyms:

AEC – Atomic Energy Commission

cm² – square centimeter

dpm - disintegration per minute

EPA - U.S. Environmental Protection Agency

MDA – minimum detectable activity

mrem/y – millirem per year

pCi/g – picocurie per gram

PRG - Preliminary Remediation Goal

TABLE 7-3: RADIOLOGICAL RISK RESULTS

Parcel B Amended Record of Decision, Hunters Point Shipyard, San Francisco, California

RESRAD-BUILD Results

Impacted Building	Radiological Risk ^{a,b}	Dose (millirem/year)
Building 103	1.48 x 10 ⁻⁶	7.02
Building 113	1.48 x 10 ⁻⁶	7.02
Building 113A	1.60 x 10 ⁻⁶	1.45
Building 130	1.60 x 10 ⁻⁶	1.45
Building 140	1.44 x 10 ⁻⁶	5.43
Building 146	1.16 x 10 ⁻⁶	1.20

Notes:

RESRAD Results

Total Dose and Risk ^a						
Impacted Soil Area	Radiological Risk ^b	Dose (millirem/year)				
Building 142 Site	6.39 x 10 ⁻⁵	3.48				
Building 157 Site	8.90 x 10 ⁻⁵	4.86				
IR-07	4.51 x 10 ⁻⁵	3.27				
IR-18	4.51 x 10 ⁻⁵	3.27				

Incremental Dose and Risk^a

Impacted Soil Area	Radiological Risk ^b	Dose (millirem/year)
Building 142 Site	4.35 x 10 ⁻⁵	2.39
Building 157 Site	5.97 x 10 ⁻⁵	3.25
IR-07	3.02 x 10 ⁻⁵	2.26
IR-18	3.02 x 10 ⁻⁵	2.26

Notes:

a Actual calculated dose and risk will be based on field measurements from the final status survey results.

Risk calculations for soil areas are based only on surface characterization and not on subsurface data. Risks consider only future risk based on radionuclides of concern at the release criteria. Risks will ultimately be based on the actual surface readings from the final status surveys.

Building 114 is not included because the site of former Building 114 has previously been surveyed and the final status survey documentation is pending submittal. Preliminarily, the site has been identified for "free release", and a request for concurrence will be submitted concurrently with the final status survey document.

IR Installation Restoration
RESRAD Residual radioactive (model)

RESRAD-BUILD Residual radioactive-building (model)

a Total risk and dose is equivalent to incremental risk and dose. Actual calculated dose and risk will be based on field measurements from the final status survey results. Incremental risk does not include risk from chemicals present at or below ambient levels; total risk includes risk from all chemical concentrations.

b Total excess lifetime cancer risk

b Total excess lifetime cancer risk



Base Realignment and Closure Program Management Office West 1455 Frazee Road, Suite 900 San Diego, CA 92108-4310

CTO No. 0006

FINAL

RADIOLOGICAL ADDENDUM TO THE REVISED FEASIBILITY STUDY FOR PARCEL D

April 11, 2008

DCN: ECSD-2201-0006-0078

PARCEL D, HUNTERS POINT SHIPYARD SAN FRANCISCO, CALIFORNIA

with the source or transport medium does not occur, then the exposure pathway is incomplete and is not quantitatively evaluated for risk. Similarly, if human contact with an exposure medium is not possible, the exposure pathway is considered incomplete and is not evaluated.

For the potentially contaminated structure surfaces the exposure pathways are external radiation from contaminated surfaces and inhalation of re-suspended contaminated dust.

The exposure pathways for the impacted soils at Parcel D present a more complicated analysis. The complete pathways, based on the four criteria listed above, are external radiation, soil ingestion, inhalation, and drinking water ingestion (e.g., groundwater).

3.3 REMEDIATION GOALS

Remediation goals (RGs) are selected to achieve the RAOs. Table 3-2 identifies the RG for each ROC. The soil RGs were derived from the EPA preliminary remediation goals (PRGs) based on an increased lifetime cancer risk range of 10⁻⁶ to 10⁻⁴ for future use scenarios except for ²²⁶Ra, which is based on an agreement with EPA (DON, 2006). The RGs for building and equipment surfaces were based on the AEC Reg Guide 1.86 to meet the 25 millirem per year (mrem/y) dose limits of the Nuclear Regulatory Commission. The water RGs were derived from *Radionuclides Notice of Data Availability Technical Document*, (EPA, 2000) by comparing the limits from two criteria and using the most conservative limit.

3.3.1 Constituents of Potential Concern

The ROCs, ¹³⁷Cs, ⁶⁰Co, ³H, ²³²Th, ²³⁵U, ²³⁹Pu, ²²⁶Ra, and ⁹⁰Sr, have been associated with Parcel D radiologically-impacted buildings (NAVSEA, 2004). The ROCs, ¹³⁷Cs, ²³²Th, ²³⁹Pu, ²²⁶Ra, and ⁹⁰Sr have been associated with Parcel D radiologically-impacted soils (NAVSEA, 2004). This information is summarized in Table 2-2.

3.3.2 Media of Concern

The media of concern are the remaining radiologically-impacted structures (274, 351, 351A, 364, 365, 366/351B, 401, 408, 411, 813, and 819); soils of former building sites (313, 313A, 317, 322 and 383 area); soils in outdoor areas (Gun Mole Pier and NRDL Site on Mahan Street); trenches resulting from sewer and storm line removal; soils of remediated storm drains and sanitary sewers; and groundwater.

3.4 RISK EVALUATION BY REDEVELOPMENT BLOCK

The following sections list the redevelopment blocks and associated evaluation scenario. Figure 2-3 shows the redevelopment blocks, impacted areas and structures, and planned reuses. The radiologically-impacted sites in Parcel D will be identified in each redevelopment block section. Radiologically-impacted sewer and storm drains are present throughout Parcel D and will not be individually listed for a particular development block. The residential scenario provided the

TABLE 3-2

REMEDIATION GOALS

	Surfaces (dpm/100 cm²)		Soil ^{c f} (_	
Radionuclide	Equipment, Waste ^a (dpm/100 cm ²)	Structures ^b (dpm/100 cm ²)	Construction Worker	Residential	Water ^f (pCi./L)
cesium-137	5,000	5,000	0.113	0.113	119
cobalt-60	5,000	5,000	0.0602	0.0361	100
plutonium-239	100	100	14.0	2.59	15
radium-226	100	100	1.0 ^d	1.0 ^d	5.0 ^e
strontium-90	1,000	1,000	10.8	0.331	8
thorium-232	1,000	36.5	19.0	1.69	15
hydrogen-3	5,000	5,000	4.23	2.28	20,000
uranium-235	5,000	488	0.398	0.195	30

Notes:

- ^a These limits are based on AEC *Regulatory Guide 1.86* (1974). Limits for removable surface activity are 20 percent of these values.
- These limits are based on 25 mrem/y, using DandD Version 2 or *Regulatory Guide 1.86*, whichever is lower.
- ^c EPA PRGs for two future-use scenarios.
- Limit is 1 pCi/g above background; not to exceed 2 pCi/g total, per agreement with EPA.
- e Limit is for total radium concentration.
- Taken from *Revised Final Basewide Radiological Removal Action, Action Memorandum.* Hunters Point Shipyard, San Francisco, California. February 14.

Abbreviations and Acronyms:

AEC – Atomic Energy Commission

cm² – square centimeter

dpm – disintegration per minute

EPA – U.S. Environmental Protection Agency

MDA - minimum detectable activity

mrem/y – millirem per year

pCi/g – picocurie per gram

PRG - Preliminary Remediation Goal

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cobalt-60	5,000	5,000	0.0602	0.0361	
plutonium-239	100	24.7	14.0	2.59	
radium-226	100	100	1.0°	1.0°	
strontium-90	1,000	1,000	10.8	0.331	
thorium-232	1,000	36.5	2.7	1.69	
hydrogen-3	5,000	5,000	4.23	2.28	
uranium-235	5,000	488	0.398	0.195	

Notes:

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- The on-site and off-site laboratory will ensure that the MDA meets the listed release criteria by increasing sample size or counting time as necessary. The MDA is defined as the lowest net response level, in counts, that can be seen with a fixed level of certainty, customarily 95 percent. The MDA is calculated per sample by considering background counts, amount of sample used, and counting time.
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PRG - Preliminary Remediation Goal

COMPREHENSIVE LONG-TERM ENVIRONMENTAL ACTION NAVY (CLEAN II) Northern and Central California, Nevada, and Utah Contract No. N62474-94-D-7609

Contract Task Order No. 011

Prepared for

U.S. DEPARTMENT OF THE NAVY Naval Facilities Engineering Command Engineering Field Activity West San Bruno, California

PARCEL C REMEDIAL INVESTIGATION

DRAFT FINAL REPORT

HUNTERS POINT SHIPYARD

SAN FRANCISCO, CALIFORNIA

March 13, 1997

Prepared by

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James M. Sickles, PRC Project Manager

TABLE ES-1 HUMAN HEALTH RISK ASSESSMENT RESULTS AND RECOMMENDATIONS FOR SOIL HUNTERS POINT SHIPYARD, PARCEL C REMEDIAL INVESTIGATION

		. aline (j Alinto , vitur				Lichtig (Li	Reco	mmended	for FS Evalu	ation'	n alta kirja kaligi		
Site No.	Cancer Risk Range	Cancer Risk ^b ≥ 1 x 10 ⁻⁶	Ш≥1°	Lead ≥ Level of Concern d	Ecological Risk	Metals	VOCs	SVOCs	Pesticides	PCBs	TPHs		
IR-27	Future Residential: 1 x 10 ⁻⁵ to 2 x 10 ⁻⁵	Yes	Yes	No	No terrestrial environmental/	x		х	Anning Control of State		х		
	Future Industrial: 9 x 10 ⁻⁷ to 2 x 10 ⁻⁶	Yes	No	No	ecological risk for soil				NY - WATER AND		Anusia da Antonio de A		
IR-28	Future Residential: 1 x 10 ⁻⁸ to 6 x 10 ⁻²	Yes	Yes	Yes	No terrestrial environmental/	X	х	х	X	Х	х		
	Future Industrial: 2 x 10 ⁻¹⁰ to 7 x 10 ⁻⁵	Yes	No	Yes	ecological risk for soil				distribution of the second of		1941. A.A.A.		
IR-29	Future Residential: 1 x 10 ⁻⁸ to 9 x 10 ⁻³	Yes	Yes	Yes	No terrestrial environmental/	x	X	X	X	х	-	х	х
	Future Industrial: Yes Yes Yes ecological 1 x 10 ⁻⁹ to 2 x 10 ⁻⁴ for soil	ecological risk for soil											
IR-30	Future Residential: 2 x 10 ⁻⁷ to 2 x 10 ⁻⁴	Yes	Yes	Yes	No terrestrial environmental/	X				Х	X		
,	Future Industrial: 8 x 10 ⁻⁸ to 7 x 10 ⁻⁶	Yes	No	No	ecological risk for soil						-		
IR-45*	(f)	(f)	(f)	(f)	No terrestrial environmental/ ecological risk for soil	Х		Х					
IR-49*	(f)	(f)	(f)	(f)	No terrestrial environmental/ ecological risk for soil	X		Х		Х	Х		
IR-50* (Storm Drain)	(f)	(f)	(f)	(f)	No terrestrial environmental/ ecological risk for soil	X							

TABLE ES-1 (Continued) HUMAN HEALTH RISK ASSESSMENT RESULTS AND RECOMMENDATIONS FOR SOIL HUNTERS POINT SHIPYARD, PARCEL C REMEDIAL INVESTIGATION

				des de la companya d		Recommended for FS Evaluation					
Site No.	Cancer Risk Range	Cancer Risk ^b ≥ 1 x 10 ⁶	HI ≥ 1°	Lead ≥ Level of Concern ^d	Ecological Risk	Metals	VOCs	SVOCs	Pesticides	PCBs	TPHs
IR-50* (Sanitary Sewer)	(f)	(f)	(f)	(f)	No terrestrial environmental/ ecological risk for soil	Х					
IR-51*	(f)	(f)	(f)	(f)	No terrestrial environmental/ ecological risk for soil	Х		Х		Х	X
IR-57	Future Residential: 6 x 10 ⁻⁸ to 4 x 10 ⁻⁴	Yes	Yes	Yes	No terrestrial environmental/	х		X			х
	Future Industrial: 4 x 10 ⁻⁸ to 4 x 10 ⁻⁵	Yes	No	No	ecological risk for soil				-		
IR-58	Future Residential: 8 x 10 ⁻⁷ to 9 x 10 ⁻⁴	Yes	Yes	Yes	No terrestrial environmental/	х		X	Х	Х	х
	Future Industrial: 2 x 10 ⁻⁸ to 1 x 10 ⁻⁵	Yes	No	No	ecological risk for soil					WHAT AND	
IR-63	Future Residential: 5 x 10 ⁻⁵ to 7 x 10 ⁻⁵	Yes	Yes	No	No terrestrial environmental/	х					
	Future Industrial: 1 x 10 ⁻⁶ to 5 x 10 ⁻⁶	Yes	No	No	ecological risk for soil	- Company of the Comp				TTT THE THE THE THE THE THE THE THE THE	
IR-64	Future Residential: 7 x 10 ⁻⁸ to 2 x 10 ⁻⁴	Yes	Yes	No	No terrestrial environmental/	x					
	Future Industrial: 1 x 10 ⁻⁶ to 2 x 10 ⁻⁵	Yes	No	No	ecological risk for soil	er-boomballintel-migratur with the		nerve and the second se	ALADA AND AND AND AND AND AND AND AND AND		





Final

Feasibility Study Report for Parcel C

Hunters Point Shipyard San Francisco, California

July 31, 2008

Prepared for:

Base Realignment and Closure Program Management Office West San Diego, California

Prepared by:

SulTech, A Joint Venture of Sullivan Consulting Group and Tetra Tech EM Inc. 1230 Columbia Street, Suite 1000 San Diego, California 92101

Prepared under:

Naval Facilities Engineering Command Contract Number N68711-03-D-5104 Contract Task Order 018

SULT.5104.0018.0004

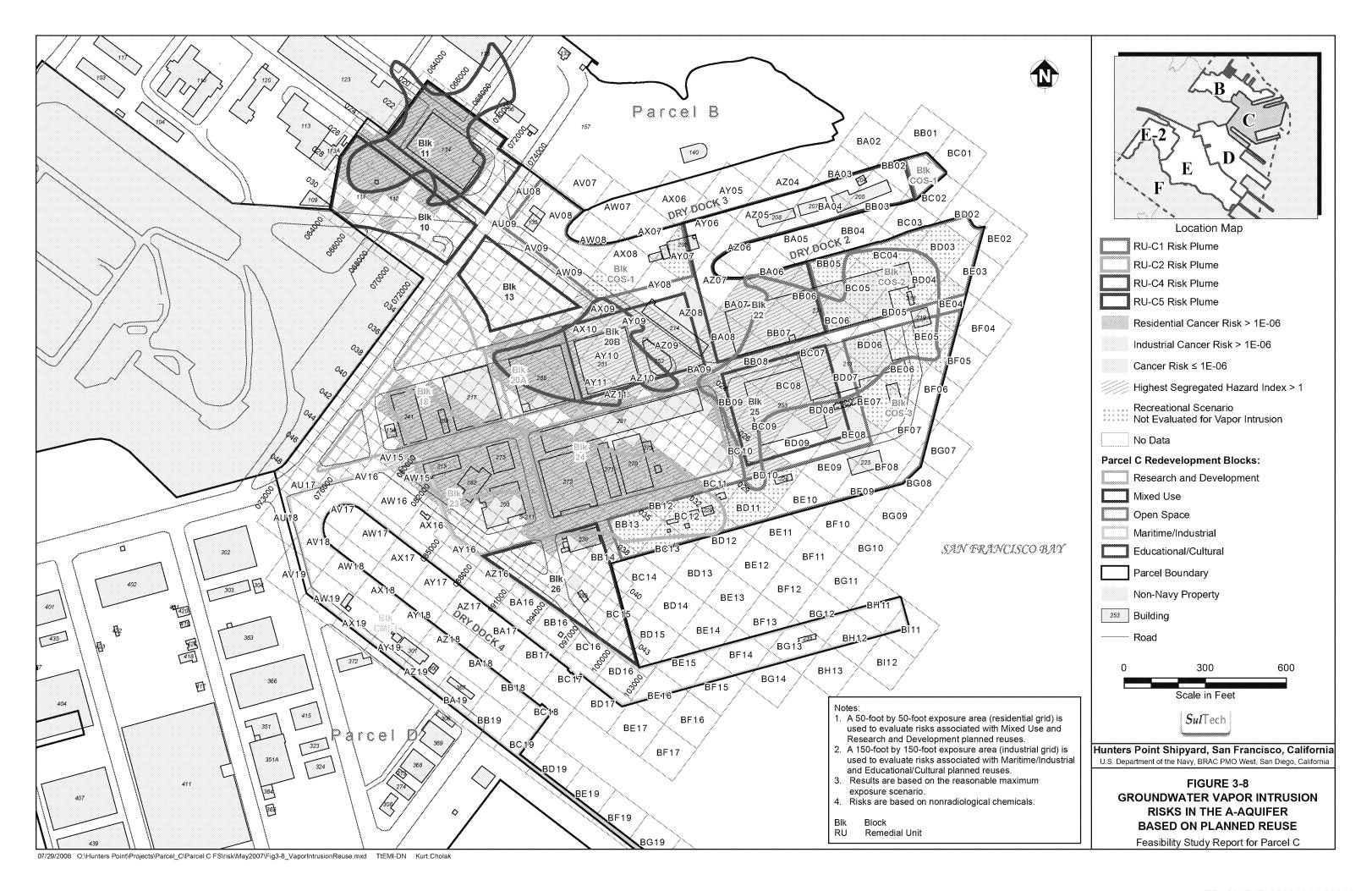


TABLE 3-3: TOTAL RISK - SUMMARY OF CANCER RISKS AND HAZARD INDICES BY PLANNED REUSE, SUBSURFACE SOIL (0 TO 10 FEET BGS)

Feasibility Study Report for Parcel C, Hunters Point Shipyard, San Francisco, California

Redevelopment Block	Planned Reuse	Grid Number	RME Cancer Risk	RME Hazard Index	RME Segregated Hazard Index
10	MU	063024	9E-05	6E+00	2E+00
10	MU	063027	9E-05	8E+00	3E+00
10	MU	063028		<1	<1
10	MU	064024	2E-04	9E+00	4E+00
10	MU	064026	3E-07	<1	<1
10	MU	064027	7E-08	<1	<1
10	MU	064028	1E-05	2E+00	<1
10	MU	064029	5E-05	2E+00	<1
10	MU	065026	1E-04	6E+00	2E+00
10	MU	065027	4E-06	<1	<1
10	MU	065028	1E-04	1E+01	5E+00
10	MU	065029	6E-05	1E+01	6E+00
10	MU	066025	9E-05	2E+00	<1
10	MU	066026	1E-04	1E+01	4E+00
10	MU	066027	2E-04	5E+00	<1
10	MU	066028	9E-05	1E+01	7E+00
10	MU	067025	9E-05	1E+01	3E+00
10	MU	067026	2E-04	7E+00	2E+00
10	MU	067027	7E-05	1E+01	6E+00
10	MU	067028	9E-05	1E+01	5E+00
10	MU	068025	9E-05	1E+01	4E+00
10	MU	068026	2E-04	1E+01	7E+00
10	MU	068027	8E-05	1E+01	6E+00
10	MU	069025	9E-05	8E+00	2E+00
10	MU	069026	5E-05	2E+01	9E+00
10	MU	069027	6E-05	1E+01	5E+00
10	MU	070025	1E-04	2E+01	6E+00
10	MU	070026	3E-07	1E+01	6E+00
11	MU	064020	4E-08	<1	<1
11	MU	064023	9E-05	5E+00	<1
11	MU	065020	5E-07	<1	<1
11	MU	065021	1E-04	1E+01	4E+00
11	MU	065022	3E-04	3E+00	<1
11	MU	065023	1E-04	3E+00	<1
11	MU	065024	1E-04	7E+00	2E+00
11	MU	066020	9E-05	2E+00	<1
11	MU	066021	1E-06	2E+00	<1
11	MU	066022	2E-04	1E+01	3E+00
11	MU	066023	1E-04	1E+01	4E+00
11	MU	066024	1E-04	6E+00	5E+00
11	MU	067019	4E-06	<1	<1
11	MU	067020	9E-05	6E+00	5E+00
11	MU	067021	7E-06	<1	<1

TABLE 3-3: TOTAL RISK - SUMMARY OF CANCER RISKS AND HAZARD INDICES BY PLANNED REUSE, SUBSURFACE SOIL (0 TO 10 FEET BGS) (CONTINUED)

Feasibility Study Report for Parcel C, Hunters Point Shipyard, San Francisco, California

Redevelopment Block	Planned Reuse	Grid Number	RME Cancer Risk	RME Hazard Index	RME Segregated Hazard Index
11	MU	067022	2E-04	6E+00	<1
11	MU	067023	2E-07	2E+00	2E+00
11	MU	067024	1E-04	1E+01	3E+00
11	MU	068019	7E-05	5E+00	2E+00
11	MU	068020	9E-05	4E+00	3E+00
11	MU	068022	8E-06	<1	<1
11	MU	068024	1E-04	9E+00	3E+00
11	MU	069022	6E-05	1E+01	6E+00
11	MU	069023	3E-08	<1	<1
11	MU	069024	3E-05	1E+01	7E+00
11	MU	070024	1E-04	7E+00	2E+00
11	MU	071019	1E-07	7E+00	2E+00
11	MU	071024	1E-04	6E+00	<1
13	MU	075027	1E-04	1E+01	6E+00
13	MU	077028	6E-05	1E+01	3E+00
13	MU	078027		<1	<1
13	MU	078028	5E-05	4E+00	<1
13	MU	078029	State State	<1	<1
13	MU	079027	8E-05	7E+00	4E+00
13	MU	079029	4E-05	1E+01	8E+00
13	MU	079030	3E-05	2E+01	5E+00
13	MU	080025	1E-04	6E+00	3E+00
13	MU	080026	9E-05	1E+01	4E+00
13	MU	080029	4E-09	<1	<1
13	MU	081027	90 M	a	a
13	MU	082026	2E-04	7E+00	2E+00
13	MU	082027	1E-04	8E+00	2E+00
18	RD	075039	4E-08	<1	<1
18	RD	075043	2E-04	8E+00	2E+00
18	RD	075044	2E-08	3E+00	<1
18	RD	076034	8E-05	7E+00	2E+00
18	RD	076038	2E-04	1E+01	3E+00
18	RD	076039	1E-05	<1	<1
18	RD	076040	9E-07	<1	<1
18	RD	076043	8E-05	5E+00	<1
18	RD	077035	6E-05	1E+01	3E+00
18	RD	077037	3E-04	8E+00	2E+00
18	RD	077038	2E-04	1E+01	3E+00
18	RD	077039	1E-04	7E+00	2E+00
18	RD	077040	2E-04	2E+01	1E+01
18	RD	078032	1E-05	1E+01	6E+00
18	RD	078036	4E-04	1E+01	5E+00
18	RD	078037	2E-04	1E+01	4E+00





Base Realignment and Closure Program Management Office West 1455 Frazee Road, Suite 900 San Diego, California 92108-4310

CONTRACT No. N62473-10-D-0809 CTO No. 0007

FINAL FINAL STATUS SURVEY RESULTS March 2013

DCN: RMAC-0809-0007-0100

FORMER BUILDING 507 SITE HUNTERS POINT NAVAL SHIPYARD SAN FRANCISCO, CALIFORNIA To provide the best possible estimation of dose and risk for the residual activity at the Former Building 507 Site, the DON used the most current version of RESRAD for calculations.

3.2.3 Wide-Area Derived Concentration Guideline Level

The wide-area DCGL (DCGL $_{\rm w}$) is the average concentration across the site that is equivalent to the release criterion, based on dose or risk. The DCGL $_{\rm w}$ for each ROC is presented in Table 3-1.

TABLE 3-1
RELEASE CRITERIA FOR RADIONUCLIDES OF CONCERN

Radionuclide	Structures Total Surface Activity Release Criteria (dpm/100 cm²)	Structures Removable Surface Activity Release Criteria (dpm/100 cm²)	Soils Release Criteria (pCi/g)
Cesium-137	5,000	1,000	0.113
Plutonium-239	100	20	2.59
Radium-226	100	20	1.0ª
Strontium-90	1,000	200	0.331

Notes:

Abbreviations and Acronyms:

cm² – square centimeter

dpm – disintegrations per minute

EPA – U.S. Environmental Protection Agency

pCi/g - picocuries per gram

3.3 DIRECT APPLICATION OF DCGLS

In the simplest case, the DCGLs may be applied directly to survey data to demonstrate compliance. This involves assessing the activity levels and comparing measured values to the appropriate DCGL.

3.4 INVESTIGATION LEVELS

Investigation levels are specific levels of radioactivity used to indicate when additional investigation may be necessary. Investigation levels also serve as a quality control check. For example, in addition to indicating potential contamination, a measurement that exceeds the investigation level may indicate that the survey unit was improperly classified or may indicate a failing instrument.

When determining an investigation level using a statistically based parameter (e.g., standard deviation), the following may be considered: survey objectives, underlying radionuclide

3-3

Former Building 507 Site Hunters Point Naval Shipyard DCN: RMAC-0809-0007-0100 CTO No. 0007

^a Limit is 1 pCi/g above background, per agreement with EPA.

3.2.1 Use of DCGLs for Sites with Multiple Radionuclides

Typically, each radionuclide DCGL corresponds to the release criterion (e.g., regulatory limit in terms of dose or risk). However, in the presence of multiple radionuclides, the total of the DCGLs for all radionuclides would exceed the release criterion. In this case, the individual DCGLs need to be adjusted to account for the presence of multiple radionuclides contributing to the total dose. One method for adjusting the DCGLs includes the use of the unity rule and development of a gross activity DCGL for surface activity to adjust the individual radionuclide DCGLs.

The unity rule, represented in the expression below, is satisfied when radionuclide mixtures yield a combined fractional concentration limit that is less than or equal to 1:

$$\frac{C_1}{DCGL_1} + \frac{C_2}{DCGL_2} + \dots \frac{C_i}{DCGL_i} \le 1$$

Where:

 C_i = concentration of radionuclide "i" $DCGL_i$ = DCGL of radionuclide "i"

In the event of a mean concentration less than zero, the value used in calculations was set at zero. The following equation, using the mean concentrations of 0.007 pCi/g for ¹³⁷Cs, 0.000 pCi/g for ²³⁹Pu, 0.425 pCi/g for ²²⁶Ra, and 0.000 pCi/g for ⁹⁰Sr from Survey Unit 1, demonstrates that the unity rule is satisfied:

$$\frac{0.007 \ pCi/g}{0.113 \ pCi/g}^{137}Cs + \frac{0.000 \ pCi/g}{2.59 \ pCi/g}^{239}Pu + \frac{0.425 \ pCi/g}{1.375 \ pCi/g}^{226}Ra + \frac{0.000 \ pCi/g}{0.331 \ pCi/g}^{90}Sr = 0.375$$

3.2.2 DCGL Modeling

Radionuclide-specific release criteria, referred to as DCGLs, were obtained from the AM and were then modeled using RESRAD Version 6.3 (a previous version) based on the 25 mrem/y total effective dose equivalent or were otherwise risk-based; the final doses using the risk-based release criterion for HPNS are all less than this 25 mrem/y release criterion. Following discussions with the EPA and as a matter of policy at HPNS, the DON and the Radiological Affairs Support Office (RASO) will also ensure that the resulting ELCR falls within the EPA risk management range of 10⁻⁶ to 10⁻⁴ prior to recommending a site or building for unrestricted release. This ELCR is more conservative than the NRC dose-based unrestricted release criterion of 25 mrem/y. Additionally, lead-210 was modeled at secular equilibrium with ²²⁶Ra activity to ensure that all possible exposures were considered. The original model used in the AM for the critical group was based on default RESRAD Version 6.3 parameters.





Final

Addendum 1 to the Remedial Action Completion Report for Soil Hotspot Locations at Parcels B, D-1, and G and Soil Stockpiles at Parcel D-1 and G

Hunters Point Naval Shipyard San Francisco, California

April 2014

Prepared for:

Department of the Navy
Base Realignment and Closure
Program Management Office West
San Diego, California

Prepared by

Engineering/Remediation Resources Group, Inc. 115 Sansome Street, Suite 200 San Francisco, California 94104

Prepared under:

Naval Facilities Engineering Command Southwest Contract No. N62473-09-D-2608 Contract Task Order 0004 Document Control No. ERRG-2608-0004-0004.A1/F

	DIRT SHOP, INC.				
Project:	US Navy Hunters Point	 Naval Shipyard	- Morrell St. @ E.	St. (parcel D-1)	
Client:	ERRG				
Service:	Transport & disposal no	 	oil w/ non-friable	serpentine to Hay R	d. Landfill
			US Navy	Waste Weight	Waste Weight
Load #	Date of Offhaul	Manifest #	Tracking #	per load (in tons)	per day (in tons)
1	8/20/2013	002978	14818	33.95	
2	8/20/2013	002979	14819	28.73	
3	8/20/2013	002980	14820	16.72	
4	8/20/2013	002981	14821	16.98	
5	8/20/2013	002982	14822	29.25	
6	8/20/2013	002983	14823	<u>25.47</u>	151.1
Total to	ons of non-haz soil w/ non-	 -friable serp. of	ffhauled 8/20/13:	151.1	
Service:	Transport and disposal	non-hazardous	general debris to	Hay Rd. Landfill	
			US Navy	Waste Weight	Waste Weight
Load #	Date of Offhaul	Manifest #	Tracking #	per load (in tons)	per day (in tons)
1	8/20/2013	002989	14829	13.4	13.4
	Total tons of non-haz ge	eneral debris of	ffhauled 8/20/13:	13.4	

YON-HAZARDOUS NASTE MANIFEST	1, Generator ID Number CA000101969		2. Page 1.g/	415-852			an mailing addin	racking Num) 029	7
enerator's Name and Maili srator's Phone:445-74	US Navy BRA 1 Avenue of t Sen Francisco	C PMO-W (Hunters he Petrus, Ste. 161 s, CA 94130 USA		Hu	store Pt Na	ved Ship	yard, Morn 1102 USA	# 00 0 0 (7)	: 3 :/<	رنح	
ransporter 1 Company Nar ransporter 2 Company Nar	Sancher	<u> 77</u> an	_{\$ρο} Α	<u>l</u> n			U.S. EPA ID L C.A.F. U.S. EPA ID		13:	5/26	<u> </u>
esignated Facility Name a		Hay Road Landlik Rd. CA 95687USA	•				US, EPA ID		O82	X2876	••••••
9. Waste Shipping Nan				7. E	10*Contain No.	ers Type	11. Total Quantity	12. Unit Wt./Vol.			
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2					•						
3.											
Soecial Handling Instruct	ione and Additional Information										
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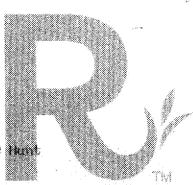
RECOLOGY HAY ROAD RECOLOGY HAY ROAD

6426 Hay Road Vacaville, CA 95607

Phone: (707)-678-4718 Truck: 9F04371

Customer: 52340/DIRT SHOP, INC.

Profile: 5848/US Mavy Brac, PMO-W Munt



Ticket: 1239146 Date: 8/20/2013

Time: 11:18:28 - 11:33:19

Gross: 98560 LBS Scale. 30660 LDS Tares Scale

Met: 67900 LDS

Scale: H2

Origin

Materials & Services

Quantity

SFR/San Francisco

SDELE/Sere Contaminates

Terri Wilson

WMSTR4-LO 9/09 • Printed on recycled paper

(1249)4819

A	11012.11000110000	1. Generator ID Number		2. Page 1 of	3. Energency Respo	40 to 1	4. Waste Ti	rsčking Numl		2979
	WASTE MANIFEST 5. Generator's Name and Malline	CA0001019894		41	415-552-1818 Generator's Site Add	tess (if different th	an mailing addre	YSS) .	<u> </u>	<u>.v.J</u>
	Generator's Phone: 445, 743	US Navy BRAC 1 Avenue of the San Francisco,	PMO-W (Hunters P Palme, Ste. 161 CA 94130 USA	THE R. P. LEWIS CO., LANSING, MICH. 49, 18	Hunters F	Pi Nevel Ship claco, CA &	yard, Morre		8	
	6. Transporter 1 Company Name	18 Truck	INC	,			U.S. EPA ID	200000000000000000000000000000000000000	184 18	ìΩ
***************************************	7. Transporter 2 Company Name				**************************************		U.S. EPA ID	Number	· <u> </u>	~ \
	8. Designated Facility Name and	1 Site Address			***	······································	U.S. EPA ID	Number	,0000000000000000000000000000000000000	**************************************
	Julian Maria	Recology H 6426 Hay R	lay Road Landfill Rd CA 95687 USA					CA	D982042475	•
***************************************	Facility's Phone: 707-676-4					***************************************		·	·····	***************************************
	9. Waste Shipping Name				10. C No.	Containers Type	11. Total Quantity	12. Unit Wt./Vol.		
HOTA)	1. Non-hazardou	us waste, solid (soil wil	th Chromism and Nic	olean)	1	DT	18	Υ		
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	3.									
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f	17. Discrepancy									
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SACILITY	17b. Alternate Facility (or Gene Facility's Phone:	erator)					U.S. EPA IC) Number		
DESIGNATED FACILITY	17c. Signature of Alternate Fac	clity (or Generator)							Month	Day Year
DES)		ey Organstyn Considerab	and ad materials	No. openidano	Til gag nordered in 12					
L\	18. Designated Facility Owner Printed/Typed Name	r or Operator: Certification of reco Tem: W		·····	epi as noted in them 17 lignature		Ź		\ \\\	الم المراحة

169-BLC-O 6 10498 (Rev. 8/06)

TRANSPORTER #1

RECOLOGY HAY ROAD RECOLOGY HAY ROAD 6426 Hay Road Vacaville, CA 95687 Phone: (707)-678-4718 Truck: 9249 Customer: 52340/DIRT SHOP, INC.

Profile: 5849/US Navy Brac, PMO-W MAN

Ticket: 1239140 Date: 8/29/2013

Time: 11:11:53 - 11:24:52

Gross: 91400 LBS_ Scale Tare: 33940 LBS Scale

Net: 57460 LBS

Scale: H2

Origin

Materials & Services

Quantity

SFR/San Francisco

SULLC/Self Combautrated

57,18

Joseph Snýder

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11 14820

A	NON-HAZARDOUS WASTE MANIFEST	1, Generally ID Number	<u>*</u>	2 Page 1 of 3.E	CAR2.1018			racking Numbe	002980
	5. Generator's Name and Maili	ing Address	*** *** ***	Gan	erator's Site Addres				
	Associated Dhones	US Navy BRAC F 1 Averue of the F San Francisco, C	Mino 50 101 A 84130 USA	rokt,	Hunters Pt I San Francis	Nervel Ship sco, CA 9	yerd, Morr 4102 USA	els QES	*.
	Generator's Phone 416 746 6. Transporter 1 Company Nar		~ 1	······································	***************************************		U.S. EPAID	1 Number	001847A
	7. Transporter 2 Company Nas	me .		······			U.S. EPA ID	Number	
	Designated Facility Name a	nd Site Address			.*		U.S. EPA ID	Number	
		8428 Hay Rd Vacaville, CA	Road Landfill 96687 USA					CAD	982042475
	Facility's Phone: 707-678-	4718				······································			
	9. Waste Shipping Nam	ne and Description		W	10. Con	tainers Type	11. Total Quantity	12. Unit Wt./Vol.	
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	13. Special Handling Instruct	ions and Additional Information				<u> </u>			8
	Generator contac	st: D. DeLong, E CIV OAS Ewhen handling weste. W	NEIBE), BRAC	PMO West Dou	tee.delong@	nevy.mil	Tracking	*	• 6.
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¥	<u> </u>	Doug Delak)9		Work.	5 JL			18 2013
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Š	Transporter 2 Printed/Typed I			Signatu		~			Month Day Year
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	17b. Atternate Facility (or Ger	nerator)			Manifest Fielerence	e Number.	U.S. EPA I	D Number	W
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O FE	Facility's Phone:	nellika (ne Cantà					1		March Re-
MATE	17c. Signature of Alternate Fr	ecuny (or Generator)					***************************************	Na.	Month Day Year
DESIGNATED FACILITY									
ä								T.N	
	18. Designated Facility Owner	er or Operator: Certification of restrict	of mytherials covered by	the manifest except as	noted in ligar 17a	7	マン		
Į	Printed/Typed Name	1.	/	Signati,	·····	/ (7\v.*		Marth Day Year
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15/	a and a stablished						in the second	Samuel Comment	· · · · · · · · · · · · · · · · · · ·

RECOLOGY HAY ROAD RECOLOGY HAY ROAD

6426 Hay Road Vacaville, CA 95687

Phone: (707)-678-4718 fruck: 5463

Customer: 52340/DIRT SHOP. INC.

Profile: 5848/US Navy Brac, PMO-W Hand



Ticket: 1239096

Time: 10:23:34 / 10:28:50

Gross: 64549 LES Scale

31100 LBS PreTare Tares

Net: 33440 LBS

Scale: H1

Origin

SFR/San Francisco

Ma**teri**als & Servic**e**s

SOLLESSOLL Continues and

Quantity

Joseph Smyder

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H 14821

À	NON-HAZARDOUS	1. Generator ID Number	2. Page 1 of	3. Emergency Respor	se Phone	4. Waste T	racking Numb	
	WASTE MANIFEST	CA0001019894		#15-652-1818 Generator's Site Addre	ness III Allement 15	non mailine and	eses i	002981
	5. Generator's Name and Maile	US Navy BRAC PMO-W 1 Avenue of the Paims, San Francisco, CA 941	Ste. 161	Hunters P		yerd, Mom		\$
	Generator's Phone: 446 746 6. Transporter 1 Company Nar	₩713	881116 7	R# 198		U.S. EPA ID		
	18-TRU	KING SAN FRA	Verte CAL 1	2.# 90769	70 .2	LC A	IRO.	00184786
	7. Transporter 2 Company Nar	T iS				U.S. EPA ID	Number	
	A 90 11 12 1 10 10 10 10 10 10 10 10 10 10 10 10 1	. J. Cho. R. Chana				He gar	Monte	***************************************
	8. Designated Facility Name a	nd Site Address Recology Hay Road 8428 Hay Rd. Vacarville, CA 9568				U.S. EPA ID		982042475
	Facility's Phone: 707-678-				19			
	9. Waste Shipping Nam			10. Co	mainers	11. Total	12. Unit	
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	3.							
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	4.							
	and the second							
	13. Special Handling Instruct	one and Additional information						
	Wear proper PPE Hey Rd. Job #: Ji 14. GENERATOR'S CERTIFI	CATION: I certify the materials described abo	d cents of deposal req we on this manifest are not subj	by Generator, I	30x #\$-18	ning 24/7 c	ontact#.	·····
V	Generator's/Offeror's Printed/	Typed Name OCAS DOZOVO		ignature	15			108 20 173
<u>.</u>	15. International Shipments	}******	л — — — — — — — — — — — — — — — — — — —		*****		i, federapiasidelasymphilis eerympe	<u> </u>
Ä	Transporter Signature (for exp	Limport to U.S. ports only):	☐ Export from		if entry/exit: leaving U.S.;		***************************************	
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48	/ <i>B-TRUCK</i> Transporter 2 Printed/Typed I			ikneture				
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f	17. Discrepancy							
1	17a. Discrepancy Indication S	Space Quantity	□т _{уре}	☐ Residue		☐ Panial F	leiection	☐ Full Rejection
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Š	Facility's Phone:							
8	17c. Signature of Alternate Fi	acility (or Generator)					<u> </u>	Month Day Year
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- DESIGNATED FACILITY					^			
	18. Designated Facility Owne	er or Operator: Certification of receipt of righter	ials covered by the manifest exc	ept as noted in Item 172	77			
	Printed/Typed Name	11		Signature /	/	.		Month Day Year
Ť	<u></u>						***************************************	10 10 13
169	3-BLC-O 6 10498 (Re	ev. 8/06)						TRANSPORTER #1

RECOLOGY HAY ROAD

RECOLOGY HAY ROAD

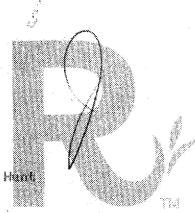
6426 Hay Road Vacaville, CA 95687

Phone: (707) 678-4718

Truck: 3993

Customer: 52340/DIRT SHOP, INC.

Profile: 5848/US Havy Brac, PMO-W Hent



Ticket: 1239095

Date: 8/20/2013

Time: 10:27:12 - 10:27:18

Bross: 64240 LBS Scale Tare: 30680 LBS Prefare

Net: 33900 (BS

Scale: H1

Origin Radomials & Services Onantity
SFR/San Francisco SOLE/Soll Contaminated 15.99 jobs //

Joseph Snyder

WMSTR4-LO 9/09 🗘 Printed on recycled paper

H 14822

Å	NON-HAZARDOUS WASTE MANIFEST	1. Generator ID Number	1 3 1	3. Emergency Respon	se Phone	4. Waste Ti	acking Nun	[™] 00298	2
	5. Generator's Name and Maili	CA0001019894 ng Address	1 3 1	415-552-1818 Generator's Site Addre	ss (if different th	an mailing addre	ess)		
	Generator's Phone 415-74	US Navy BRAC PMO-1 1 Avenue of the Palms San Francisco, CA 94	V (Hunters Point) Ste. 161	Hunters Pt	Naval Ship ieco, CA 9	ward. Morri	ŕ	ES.	
	6. Transporter 1 Company Nar	38				U.S. EPA ID			
		18Trucki	75			L C+	<u>e 000</u>	2184 <u>788</u>	
	7. Transporter 2 Company Nar	748				U.S. EPA ID			
	8. Designated Facility Name.ai	nd Site Address Recology Hay Ros 8426 Hay Rd	/ Landfill	······································	***************************************	U.S. EPA ID		D982042475	
	Facility's Phone: 707-676-	Vacaville, CA 956	17 USA		v * :				
				10, Coi	ntainers	11, Total	12. Unit		
	9. Waste Shipping Nam	ne and Description		No.	Type	Quantity	Wt./Vol.		
GENERATOR	Non-hazardo	ue waste, solid (soil with Chro	nium and Nickel)	1	σ	16	Υ.		
839 -	2.					×			
	3.								
	4.								
	13. Special Handling Instruct	ions and Additional Information							
	Generator contac Wear proper PPE Hey Rd. Job #: Jil	t: D. DeLong, E CIV OASNEII when handling waste. Wi tix a 15848	(E), BRAC PMO Weet D nd certs of disposal req. 8	y Generator. B		Tracking # rleng 24/7 c		(m. 1909). Start in the second of the second	
	14 GENEDATOR'S CERTIES	CATION: I certify the materials described at	our, on this manifest are not subject	to tadarai refusibliona	for manding om	An dienocal of I	davolmerek	Parto	
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Ę	15. International Shipments	☐ Import to U.S.	☐ Export from U	S. Fan a	entry/exit:				
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RECOLOGY HAY ROAD RECOLOGY HAY ROAD 6426 Hay Road Vacaville, CA 75687 Phones (707)-678-4718 Trucks 9249 Customer: 52340/DIRT SHOP, INC.

Libense: TM **Ticket: 1239338** Date: 8/28/2013

Time: 15:38:40 - 15:38:56

Grossi 92440 LBS Scale Tares 33940 LWS FreTare

Netz 58500 LBS

Scale: H1

Profile: 5848/US Navy Brac, PMO-W Hon

Origin

SFR/San Francisco

Malogials & Services

Could Contract water

Quantity

Joseph Snyder

VMSTR4-LO 9/09 💍 Printed on recycled paper

4. Waste Tracking Number 2. Page 1 of 3. Emergency Response Phone 1. Generator ID Number NON-HAZARDOUS 5. Generator's Name and Mailing Address **WASTE MANIFEST** 415-552-1816 Generator's Site Address (if different then making address) US Navy BRAC PMC-W (funters Point) 1 Avenue of the Patme, Ste. 181 San Francisco, CA 94130 USA Huntere Pt Havel Shipyard, Morrell St. @ E.St. San Francisco, CA 94102 USA US EPAID Number CAROOO/75828 \n r Onche? 7. Transporter 2 Company Name U.S. EPA ID Number 8. Designated Facility Name and Site Address Recology Hay Road Landfill 8428 Hay Rd. Vacaville, CA 96657 USA CAD982042476 Facility's Phone: 707-678-4718 10. Containers 11. Total 12. Unit 9. Weste Shipping Name and Description Wt/Vol. No. Type Quantity OT 18 Non-hazardous wests, solid (soil with Chronium and Nickel) 13. Special Handling Instructions and Additional Information Generator contact: D. DeLong, E.CRV.CASN(EISE), BRAC PMO Weet. Douglas delong@nsvy.inii... Tracking #: West proper PPE when handling weste. With: and carts of disposal req. by Generator. Box #3-18 Triing 24/7 contact #. Hay Rti. Job #: J#5848 14. GENERATOR'S CERTIFICATION; I certify the materials described above on this manifest are not subject to federal substance for reporting proper disposal of Hazardous Waste Generator's/Offeror's Printed/Typed Name DOLA 15, International Shipments LJ Export from U.S. Port of entry/exit: Transporter Signature (for exports only): 16. Transporter Acknowledgment of Receipt of Materials dft@ 1 Printed/Typed Name *MIZO* (0 Transporter 2 Printed/Typed Name Signature 17. Discrepancy 17a, Discrepancy Indication Space Птуре Ouantity ☐ Residue L. Pantal Rejection L Full Rejection Manifest Reference Number: 17b. Alternate Facility (or Generator) U.S. EPA ID Number Facility's Phone: 17c. Signature of Alternate Facility (or Generator) Day Year 16. Designated Facility Owner or Operator: Certification of region of materials covered by the manifest except as noted in from 17a. Printed/Typed Name Signature 169-BLC-O 6 10498 (Rev. 8/06)

RECOLOGY HAY ROAD RECOLOGY HAY ROAD 6426 Hay Road Vacaville, CA 95607

Phone: (707)-678-4718 Truck: 9F04371

Customer: 52340/DIRT SHOP, INC.

Profile: 5848/US Navy Brac, PMO-W Munt

Ticket: 1239343 Date: 8/26/2013

Time: 15:27:48 - 15:44:39

Oross: 81260 L8S Scale Tare: 30320 LBS Scale

Net: 50940 LDS

Scale: H2

Origin

SFR/San Francisco

Materials & Services

Contaminated

Duantity

Joseph Snyder

WMSTR4-LO 9/09 & Printed on recycled paper

NON-HAZARDOUS	1. Generator ID Number			f 3. Emergency F		one	4. Waste Tr	acking Nu		0000	01
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ransporter 2 Company Nor	3 16		اد نو ر				U.S. EPA ID	Number			
lesignated Facility Name a lithy's Phone: 707-676	8426 Hay Vacaville,	lay Road Landill Rd. CA 95687 USA	2				US EPAID		AD082	042475	
ility's Phone: 9. Waste Shipping Nал					0. Containe	ers Type	11. Total Quantity	12. Unit WL/Vol.		***************************************	
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3.	*						2				
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RECOLOGY MAY ROAD

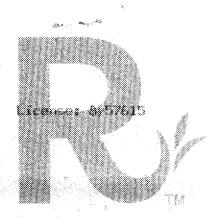
RECOLOGY MAY ROAD

6426 May Road Vacaville, CA 95687

Phone: (70?) -678-4718

Truck: 7929

Customer: 52340/DIRT SHOP, INC.



Ticket: 1239190

Date: 8/20/2013

Time: 12:10:13 - 12:12:02

Gross: 59040 LBS Scale Tare: 32240 LBS PreTare

Het: 26000 LDS

Scaler Hi

Or**igi**n SFR/San Francisco Na**turi**als & Services

CONTRACTOR STATE

Quantity

13,4000

WASTE ZBRO

Terri Wilson

WMSTR4-LO9/09 🗳 Printed on recycled paper





Final

Record of Decision for Parcel E-2

Hunters Point Naval Shipyard San Francisco, California

November 2012

Prepared by:

Department of the Navy Base Realignment and Closure Program Management Office West 1455 Frazee Road, Suite 900 San Diego, California 92108

Prepared under:

Naval Facilities Engineering Command Contract Number N68711-05-C-6011

ERRG-6011-0000-0022

Section 2 Decision Summary

Table 6. Remediation Goals for Radionuclides in Soil and Sediment

	Exposure Scenario						
	Outdoor Worker (pCi/g)	Residenta (pCi/g)					
Cesium-137	0.113	0.113					
Cobalt-60	0.252 ^b	0.252 ^b					
Radium-226	1.0°	1.0°					
Strontium-90	10.8	0.331					

Notes: The basis (risk-based) for the remediation goals is presented in Sections 7 and 9 of the radiological addendum.

EPA = U.S. Environmental Protection Agency

pCi/g = picocuries per gram

RD = remedial design

RODs = Records of Decision

a = Residential use is not planned for Parcel E-2, but residential goals are proposed as an additional level of protection.

b = Remediation goal for cobalt-60 was revised to support efficient laboratory gamma spectroscopy analysis of soil samples. This revised remediation goal maintains morbidity risks within the EPA-defined acceptable range and permits an exposure level that does not increase the risk of cancer from a potential exposure to cobalt-60.

c = Remediation goal is 1 pCi/g above background per agreement with EPA (established in "Final Basewide Radiological Removal Action, Action Memorandum – Revision 2006, Hunters Point Shipyard, San Francisco, California," dated April 21, 2006), and is consistent with the radiological-related remedies selected in the RODs for Parcels B, G, and D-1 and UC-1. The radium-226 background level for surface soil is 0.633 pCi/g. The radium-226 background level for storm drain and sewer lines is 0.485 pCi/g. The background levels for radium-226 may be reevaluated in the Parcel E-2 RD and are subject to regulatory agency approval.



Final

Feasibility Study Report for Parcel F

Hunters Point Shipyard San Francisco, California

April 30, 2008

Prepared for:

Base Realignment and Closure Program Management Office West San Diego, California

Prepared by:

Barajas & Associates, Inc. 839 W. Harbor Drive, Suite 1 San Diego, California 92101

Prepared under

Naval Facilities Engineering Command Contract Number N68711-03-D-5106 Contract Task Order 004

BAI,5106,0004,0003

Under federal standards, PCBs are not regulated as a hazardous substance under RCRA, but mercury is. As a result, removed sediment must be managed as RCRA hazardous waste if the concentration of mercury exceeds the TCLP requirements when sediments from Parcel F are contaminated with both PCBs and mercury. Off-site disposal facilities must meet the requirement of the CERCLA Off-site Rule.

Off-Site Class II or Class III Landfill Disposal. Sediment waste that would not require Class I landfill disposal may be sent to either a Class II or a Class III landfill. Class II units are more rigorous than Class III because they are constructed to isolate hazardous waste from state waters. The Class II unit is a permitted Subtitle D cell designed with a synthetic liner and leachate collection system. Class III disposal facilities are constructed to separate nonhazardous solid waste and from waters of the State of California.

Designated wastes can be disposed of at Class II landfills that have been approved for containment of the type of waste stream to be disposed of (Cal. Code Regs. tit. 27, § 20210). Designated waste is defined as "nonhazardous waste that consists of, or contains, pollutants that, under ambient environmental conditions at a waste management unit, could be released in concentrations exceeding applicable water quality objectives or that could reasonably be expected to affect beneficial uses of the waters of the state as contained in the appropriate state water quality control plan" (California Water Code § 13173).

Nonhazardous and nondesignated wastes can be disposed of at Class III landfills that have been approved for the specific type of waste stream to be disposed of. Certain contaminated soils, sludge, and industrial wastes can also be disposed of at Class III landfills.

It is anticipated that most material removed from Parcel F would be considered designated waste for disposal at a Class II facility or as alternative daily cover, although some material may be designated as waste for a Class III facility.

3.8.1.1 Effectiveness

Landfill disposal would effectively reduce the risk of exposure to chemicals in sediment at Parcel F. Disposing of contaminated sediments at an off-site landfill removes the chemicals from the aquatic setting, where they could be a hazard to ecological receptors. The contaminated sediment is placed in a landfill, eliminating the pathway from sediment to the environment. Landfill sites are readily available, and costs are comparable to treatment technologies. Therefore, disposal at a Class I, Class II or III landfill would be an effective option.

3.8.1.2 Implementability

Implementability of landfill disposal depends on locating a landfill with adequate space for the contaminated sediments and with the appropriate permits and requirements to accept the contaminated sediments. Class I landfills identified for disposal of the contaminated sediments from Parcel F include the Laidlaw facility in Buttonwillow, California, and Chemical Waste

Management's Kettleman Hills facility in Kettleman City, California. Class II landfills identified for disposal of the contaminated sediments from Parcel F include Altamont Landfill (Livermore, California), Hayroad Landfill (Vacaville, California), and Forward, Inc./Allied Waste (Manteca, California).

Disposal would be easily implemented once a landfill is found to meet the appropriate requirements. Dewatering, transportation, stabilization, and disposal of contaminated sediments in landfills have been widely conducted.

3.8.1.3 Cost

The cost of the off-site Class I landfill process option depends on several factors, such as (1) the trucking distance between HPS and the Class I landfill, and (2) the volume of waste that would require disposal. Out-of-state landfills may offer reduced disposal fees and taxes, as well as the use of rail transportation rather than trucking. Capital costs are high for Class I landfill disposal, but O&M costs are not associated with this process option.

The only treatment required for contaminated sediment to be disposed of in a Class II landfill is dewatering, so the total cost of disposal would vary, depending on the amount of dewatering required and the distance and type of transportation. Aside from dewatering, costs for disposal of contaminated sediments in a Class II landfill would be moderate.

3.8.1.4 Screening Results

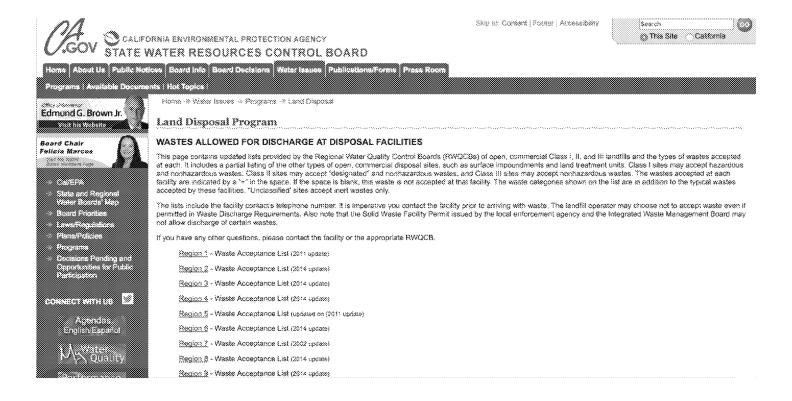
Disposal at a Class I, II, or III landfill must be conducted in conjunction with other process options; thus, they will be considered with excavation and dredging and are retained for further evaluation in this FS Report.

3.8.2 On-Site Disposal and Reuse

On-site disposal and reuse would consist of placement of the removed sediments in the Parcel E-2 landfill, located just north of Area IX/X. Given the expected low concentrations of chemicals in the sediment, it may be possible to use the sediment as landfill cover. The sediment would first be dewatered, then transported and spread and compacted in the existing landfill. Characterization of the sediments would be required prior to placement in the landfill, as discussed in Section 3.7.1.

3.8.2.1 Effectiveness

On-site disposal would effectively reduce the risk of exposure to chemicals in sediment at Parcel F. Disposing of contaminated sediments at an on-site landfill removes the chemicals from the aquatic setting, where they could be a hazard to wildlife. The contaminated sediment would be placed in the Parcel E-2 landfill, eliminating the pathway from sediment to the environment. The landfill is immediately adjacent to Area IX/X and less than 1 mile from Area III. Therefore, disposal at the Parcel E-2 landfill would be an effective option.



CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD (5) WASTE ACCEPTANCE LIST

S = SACRAMENTO OFFICE
Sacramento Watershed -- Steve Rosenbaum (916-464-4631)
San Joaquin Watershed -- Victor Izzo (916-464-4626)
Landfills -- Dane Johnson (559-445-5525)
Surface Impoundments -- Shelton Gray (559-445-5508)
R = REDDING OFFICE
Karen Clementsen (530-224-4852)

ALTURAS LANDFILL R ANDERSON SOLID WASTE INC. R	PHONE NUMBER 925-449-6349	COUNTY	CLASS	TYPE	ASB-		DRILLING	WASIE	ASH	SEPTAGE	IREALED	DESIG-	DESIG-	SOILS	PESTICIDE	
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ANDERSON SOLID WASTE INC. R			II, III	LF, SI	+	+		+	+		+	+	+	+		
	530-233-6403		III	LF						+						
	530-347-5236		III	LF	+			+	+		+					
	707-374-2559		II	LF, SI			+									
	559-386-5766		III	LF												
	209-385-7388		Ш	LF												
	530-842-8250		III	LF												
	559-386-6288		ı	LF	+	+	+	+	+	+		+	+	+	+	
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	559-324-2614	ļ	III	LF												
	916-458-5186		III	LF												
	707-262-1760		III	LF	+			+			+		+			
	209-837-4800		III	LF, SI	+											•
	209-837-4800		II	LF, SI					+							
FOOTHILL SANITARY LANDFILL S	209-468-3066	SAN JOAQUIN	III	LF, LT												•
FORWARD, INC S	800-204-4242	SAN JOAQUIN	II, III	LF, SI	+	+		+	+	+	+	+	+	+		
FRESNO COUNTY - AMERICAN AVENUE F	559-262-4295	FRESNO	III	LF				+								
FULTON RECLAMATION S	530-865-3680	GLENN	Ш	SA			+									
GLENN COUNTY LANDFILL S	530-934-6530	GLENN	III	LF												
GOPHER HILL R	530-283-6268	PLUMAS	III	LF												
H.M. HOLLOWAY GYPSUM MINE RECL. F	661-797-2320	KERN	II, III	LF		+	+		+			+				
HAY ROAD LANDFILL S	707-678-4718	SOLANO	II, III	LF, LT	+				+		+	+		+		ŧ
HIGHWAY 59 LANDFILL F	209-285-7388	MERCED	III	LF				+			+					
KERN COUNTY - BAKERFIELD METRO F	661-862-8900	KERN	Ш	LF	+	+		+			+					•
KERN COUNTY - SHAFTER-WASCO LANDFIL F	661-862-8900	KERN	III	LF				+								•
KERN COUNTY - TAFT LANDFILL F	661-862-8900	KERN	III	LF												
L & D LANDFILL S	916-383-9420	SACRAMENTO	11, 111	LF	+											
MADERA COUNTY - FAIRMEAD LANDFILL F	559-665-3099	MADERA	III	LF					+							
NEAL ROAD R	530-538-7681	BUTTE	11, 111	LF, SI	+			+		+	+					
NORTH COUNTY LANDFILL S	209-468-3066	SAN JOAQUIN	III	LF							+					
OSTROM ROAD LANDFILL S	530-743-6321	YUBA	II	LF, SI, LT	+			+		+	+	+		+		•
PORTOLA LANDFILL R	530-283-6268	PLUMAS	III	LF												
RED BLUFF LANDFILL R	530-528-1102	TEHAMA	Ш	LF												
ROCK CREEK LANDFILL S	209-754-6403	CALAVERAS	II	LF				+	+	+	+	+	+	+		
SACRAMENTO COUNTY - KIEFER LANDFILL S	916-481-1816	SACRAMENTO	III	LF	+						+				+	
SAFETY-KLEEN - BUTTONWILLOW F	800-544-7199	KERN		LF, SI			+	+				+	+	+		
SANIFILL INC McKITTRICK SITE F	661-762-7366	KERN	II	LF, SI			+	+		+		+	+	+		
SIERRA COUNTY LOYALTON LANDFILL S	530-289-3201	SIERRA	III	LF					+							
TULARE COUNTY - TEAPOT DOME SITE F	559-733-6291	TULARE	III	LF					+							
TULARE COUNTY - VISALIA LANDFILL F	559-733-6291	TULARE	III	LF					+							
TULARE COUNTY - WOODVILLE DISPOSAL F	559-733-6291	TULARE	III	LF					+							
UC DAVIS SANITARY LANDFILL S	530-754-5977	YOLO	III	LF												
WEST CENTRAL LANDFILL R	530-225-5661	SHASTA	III	LF				+			+					
WESTERN REGIONAL LANDFILL S	916-543-3960	PLACER	III	LF	+			+			+					
WESTWOOD LANDFILL R	530-252-1273	LASSEN	III	LF												
YOLO COUNTY CENTRAL LANDFILL S	530-666-8852	YOLO	11, 111	LF, SI				+					+			

LF = Landfill

LT = Land Treatment Unit

SA = Soil Amendment

SI = Surface Impoundment

U = Unclassified